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June 18, 2025

BY ECF

The Honorable Jeannette A. Vargas
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Haggai et al., v. Kiswani et al.*,
25 Civ. 2400 (JAV)

Dear Judge Vargas:

This letter is respectfully submitted, as counsel for defendant Mahmoud Khalil, on behalf of all defendants in regard to the word count for the motions to dismiss the First Amended Complaint (“FAC”) that, pursuant to the Court’s June 12, 2025, Order, are due tomorrow, June 19, 2025. The moving defendants – one entity, and four individuals in their individual capacity, three of whom will also be moving in their alleged representative capacities – respectfully request a configuration set forth below that would not exceed, or even approach, the 8,750 words per motion the Court permits in its Individual Rules. I have contacted Plaintiffs’ counsel with respect to this request, but have yet to receive a response.

Defendants propose the following: that one Memo of Law, on behalf of two separate defendants – A Jewish Voice for Peace and Nerdeen Kiswani – be allotted 13,000 words, which would, in aggregate, be fewer than 8,750 for both defendants. That joint Memo of Law will also include issues and legal analysis common to all the moving defendants, some of whom will be joining portions of that Memo of Law. That will also streamline the other moving defendants’ Memos of Law, and promote efficiency for the Court and the parties. In addition to those efficiencies achieved by the joint Memo of Law with respect to common arguments, it is also noted that the FAC is 95 pages.

The three Memos of Law filed by the other moving defendants – Maryam Alwan,

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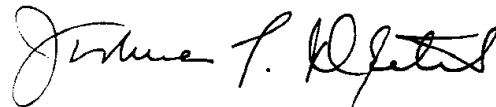
Cameron Jones, and Mr. Khalil, all of whom will be moving individually and in their alleged representative capacities – will each not exceed the 8,750 word limit.

Currently, the word count for the draft of the joint Memo of Law is below 13,000 words, and that entire allotment may not be used. However, at this point it is unknown precisely how many words that Memo of Law will occupy once it is finalized, and defendants wanted to make this application today (cognizant as well that tomorrow is a court holiday). For that reason as well we are making this application even though we have not yet been informed of Plaintiffs' position, whom we contacted late last night by email.

Thus, in aggregate, defendants will not be using more than 8,750 words per motion, but wanted to preview their proposed approach for the Court, and obtain permission to file the joint Memo of Law as set forth above.

Accordingly, it is respectfully requested that the Court grant defendants' request that one Memo of Law on behalf of two defendants' (A Jewish Voice for Peace and Nerdeen Kiswani) motions to dismiss be allotted 13,000 words.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua L. Dratel", written in a cursive style.

Joshua L. Dratel

JLD/